

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

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|---|---|----------------------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | |
| Petitioner, |) | |
| v. |) | CIVIL NO. SA-19-CA-242-OG |
| |) | |
| \$840,000.00, MORE OR LESS, IN UNITED STATES CURRENCY, |) | |
| |) | |
| Respondent. |) | |

**REQUEST FOR ENTRY OF PARTIAL DEFAULT AS TO
\$840,000.00, MORE OR LESS, IN UNITED STATES CURRENCY**

To the Honorable Jeannette J. Clack, Clerk of Court:

Petitioner, United States of America, hereby requests the entry of partial default, pursuant to Rule 55(a), Federal Rules of Civil Procedure, against the Respondent \$840,000.00, More or Less, in United States Currency and all persons claiming an interest in said property, save and except for Claimant White Energy Holding Company, LLC.,¹ for failure to file a timely claim, answer, or otherwise defend this action after notice was provided pursuant to Rule G of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, Federal Rules of Civil Procedure. An affidavit in support of this request is attached hereto as Appendix A.

¹ On June 12, 2019 and July 1, 2019 White Energy Holding Company, LLC., filed a Claim and Answer (Doc. 7 & 9) asserting its interest in the Respondent Currency. Pursuant to the Stipulation Order signed on August 16, 2019, the United States Secret Service is ordered to pay Claimant, White Energy Holding Company, LLC., the amount of \$840,000.00 for the loss it incurred (Doc. 11).

Respectfully submitted,

JOHN F. BASH
United States Attorney

By: /s/
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Attorneys for the United States of America

CERTIFICATE OF SERVICE

I hereby certify that on August 22, 2019 the foregoing instrument was electronically filed with the Clerk of the Court using the CM/ECF System which will transmit notification of such filing to the following CM/ECF participants:

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/s/
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